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10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**  
12 **SOUTHERN DIVISION**

13 ENTROPIC COMMUNICATIONS, LLC,  
14 Plaintiff,  
15 v.  
16 COX COMMUNICATIONS, INC., *et al.*,  
17 Defendants.  
18

Case No.: 2:23-cv-01049-JWH-KES  
(Lead Case)  
Case No.: 2:23-cv-01050-JWH-KES  
(Related Case)

[Assigned to the Honorable John W.  
Holcomb]

19 ENTROPIC COMMUNICATIONS, LLC,  
20 Plaintiff,  
21 v.  
22 COMCAST CORPORATION, *et al.*,  
23 Defendants.  
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**PLAINTIFF ENTROPIC'S  
APPLICATION TO FILE  
DOCUMENTS UNDER SEAL  
REGARDING PLAINTIFF'S  
PROPOSED THIRD AMENDED  
COMPLAINT; DECLARATION OF  
CASSIDY T. YOUNG; [PROPOSED]  
ORDER**

**TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Pursuant to Central District of California Local Rule 79-5.2.2(a), Plaintiff Entropic Communications, LLC (“Entropic” or “Plaintiff”) hereby applies for an order sealing **unredacted** information referenced in Entropic’s Proposed Third Amended Complaint, which contains details related to a confidential agreement between Defendant Comcast and a third-party entity.

Each portion of the documents referenced in the chart below have been designated as confidential pursuant to agreements reached between third parties or have been filed under seal by Defendant Comcast. (*See* Decl. of Cassidy T. Young in Support of Entropic’s Application to File Documents Under Seal, ¶ 4.) Entropic, therefore, applies to file such documents and information under seal pursuant to Local Rule 79-5.2.2(a).

The information to be sealed is identified below:

<b>Item to be Sealed Pursuant to L.R. 79-5.2.2(a)</b>	<b>Description of Information</b>
Entropic’s Proposed Third Amended Complaint against Defendant Comcast (“TAC”) at ¶¶ 32-36, including footnotes 4 and 5.	Terms of confidential agreement between Entropic and a third-party entity.
Entropic’s TAC at Subheading A and B and ¶¶ 38-66, including footnote 6.	Terms of confidential agreement between Comcast and a third-party entity.
Entropic’s TAC at ¶¶ 148-50.	Terms of confidential agreement between Comcast and a third-party entity.
A portion of Entropic’s TAC at ¶ 152.	Terms of confidential agreement between Comcast and a third-party entity.

Portions of Entropic's TAC at ¶ 154.	A letter between Comcast and Entropic that Comcast filed under seal.
Entropic's TAC at Subheading 5 and ¶¶ 186-88.	Terms of confidential agreement between Comcast and a third-party entity.
Entropic's TAC at ¶ 225.	Terms of confidential agreement between Comcast and a third-party entity.
Entropic's TAC at ¶ 229.	Terms of confidential agreement between Comcast and a third-party entity.
Entropic's TAC at ¶ 256.	Terms of confidential agreement between Comcast and a third-party entity.
A portion of Entropic's TAC at ¶ 260.	Terms of confidential agreement between Comcast and a third-party entity.
A portion of Entropic's TAC at ¶ 289.	Terms of confidential agreement between Comcast and a third-party entity.
A portion of Entropic's TAC at ¶ 318.	Terms of confidential agreement between Comcast and a third-party entity.
A portion of Entropic's TAC at ¶ 347.	Terms of confidential agreement between Comcast and a third-party entity.
A portion of Entropic's TAC at ¶ 376.	Terms of confidential agreement between Comcast and a third-party entity.
A portion of Entropic's TAC at ¶ 403.	Terms of confidential agreement between Comcast and a third-party entity.
A portion of Entropic's TAC at ¶ 436.	Terms of confidential agreement between Comcast and a third-party entity.
A portion of Entropic's TAC at ¶ 458.	Terms of confidential agreement between Comcast and a third-party entity.

A portion of Entropic's TAC at ¶ 480.	Terms of confidential agreement between Comcast and a third-party entity.
<b><u>Redline Compare Between FAC and SAC</u></b>	
Redline of Entropic's Proposed Third Amended Complaint and Corrected Second Amended Complaint ("Redline") at ¶¶ 32-36, including footnotes 4 and 5.	Terms of confidential agreement between Entropic and a third-party entity.
Redline at Subheading A and B and ¶¶ 38-66, including footnote 6.	Terms of confidential agreement between Comcast and a third-party entity.
Redline at ¶¶ 148-50.	Terms of confidential agreement between Comcast and a third-party entity.
A portion of Redline at ¶ 152.	Terms of confidential agreement between Comcast and a third-party entity.
Portions of Redline at ¶ 154.	A letter between Comcast and Entropic that Comcast filed under seal.
Redline at Subheading 5 and ¶¶ 186-88.	Terms of confidential agreement between Comcast and a third-party entity.
Redline at ¶ 225.	Terms of confidential agreement between Comcast and a third-party entity.
Redline at ¶ 229.	Terms of confidential agreement between Comcast and a third-party entity.
Redline at ¶ 256.	Terms of confidential agreement between Comcast and a third-party entity.

1	A portion of Redline at ¶ 260.	Terms of confidential agreement between Comcast and a third-party entity.
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3	A portion of Redline at ¶ 289.	Terms of confidential agreement between Comcast and a third-party entity.
4		
5	A portion of Redline at ¶ 318.	Terms of confidential agreement between Comcast and a third-party entity.
6		
7	A portion of Redline at ¶ 347.	Terms of confidential agreement between Comcast and a third-party entity.
8		
9	A portion of Redline at ¶ 376.	Terms of confidential agreement between Comcast and a third-party entity.
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11	A portion of Redline at ¶ 403.	Terms of confidential agreement between Comcast and a third-party entity.
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13	A portion of Redline at ¶ 436.	Terms of confidential agreement between Comcast and a third-party entity.
14		
15	A portion of Redline at ¶ 458.	Terms of confidential agreement between Comcast and a third-party entity.
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17	A portion of Redline at ¶ 480.	Terms of confidential agreement between Comcast and a third-party entity.
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20 Pursuant to Local Rule 79-5.2.2(a), Entropic applies to file under seal the  
21 documents listed above. Under Rule 79-5.2.2(a), a party may seek leave to file a  
22 document under seal so long as the Application describes the nature of the information  
23 that should be closed to public inspection and is accompanied by: (1) a declaration  
24 establishing good cause why the strong presumption of public access in civil cases  
25 should be overcome and informing the Court whether anyone opposes the Application;  
26 (2) a proposed order; (3) a redacted version of the relevant documents; and (4) an  
27 unredacted version of the relevant documents. Entropic has complied with these  
28 requirements. The information that Entropic seeks to seal is contained within: (1) a

1 confidential agreement between Comcast and a third-party entity; (2) a confidential  
 2 agreement between Entropic and a third party; and (3) a letter between Entropic and  
 3 Comcast that Comcast filed under seal. The public does not have an interest in  
 4 accessing this confidential information. Additionally, Entropic's request is narrowly  
 5 tailored to only prevent the public from viewing confidential information. Finally,  
 6 counsel for Comcast has not indicated whether they oppose Entropic's under seal filing.

7 Therefore, compelling reasons exist to seal the highlighted portions of the above  
 8 documents. *See Aya Healthcare Servs., Inc. v. AMN Healthcare, Inc.*, 2020 WL  
 9 1911502, at \*5 (S.D. Cal. Apr. 20, 2020) ("The Court agrees that compelling reasons  
 10 exist to seal references . . . to Defendants' proprietary business records that detail  
 11 sensitive financial terms, proprietary business strategies, and confidential negotiations  
 12 and agreements with third parties."); *In re Qualcomm Litig.*, 2019 WL 1557656, at \*3  
 13 (S.D. Cal. Apr. 10, 2019) (granting motions to seal "confidential business information  
 14 of the parties, including trade secrets, proprietary business records, discussions of  
 15 internal strategy, company dealings, and materials designated as 'Highly  
 16 Confidential'").

17 Accordingly, Entropic respectfully requests that this Court order the unredacted  
 18 documents to be filed under seal. Concurrent with this filing, Entropic has filed  
 19 redacted versions of these documents with the Court, which only redact information  
 20 necessary to protect confidential, private, and otherwise non-public information therein.

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 22 Dated: December 15, 2023

Respectfully Submitted,

23 By: /s/ Cassidy T. Young  
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